

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE

NIKKI BOLLINGER GRAE, Individually and )	Civil Action No. 3:16-cv-02267
on Behalf of All Others Similarly Situated, )	
Plaintiff, )	Honorable Aleta A. Trauger
vs. )	[PROPOSED] ORDER GRANTING
CORRECTIONS CORPORATION OF )	MOTION FOR APPOINTMENT AS LEAD
AMERICA, et al., )	PLAINTIFF AND APPROVAL OF LEAD
Defendants. )	PLAINTIFF'S SELECTION OF LEAD
_____ )	COUNSEL

UPON CONSIDERATION OF the motion filed by Amalgamated Bank, as Trustee for the LongView Collective Investment Fund (“Amalgamated Bank”) for appointment as lead plaintiff and approval of selection of lead counsel, and good cause appearing therefore, it is hereby ordered:

1. The motion is GRANTED.
2. Amalgamated Bank is appointed Lead Plaintiff pursuant to 15 U.S.C. §78u-4(a)(3)(B)(iii).
3. Amalgamated Bank’s selection of Robbins Geller Rudman & Dowd LLP as Lead Counsel is approved pursuant to 15 U.S.C. §78u-4(a)(3)(B)(v). Lead Counsel shall have the following responsibilities and duties on behalf of Lead Plaintiff and the putative class:
  - (a) the briefing and argument of any and all motions;
  - (b) the conduct of any and all discovery proceedings;
  - (c) the examination of any and all witnesses in depositions;
  - (d) the selection of counsel to act as spokesperson at all pretrial conferences;
  - (e) the organization of meetings of plaintiff’s counsel as they deem necessary and appropriate from time to time;
  - (f) settlement negotiations with counsel for defendants;
  - (g) the pretrial discovery proceedings and the preparation for trial and the trial of this matter, and delegation of work responsibilities to selected counsel as may be required;
  - (h) the preparation and filing of all pleadings; and
  - (i) the supervision of all other matters concerning the prosecution or resolution of the consolidated action.

IT IS SO ORDERED this \_\_\_\_ day of \_\_\_\_\_ 2016.

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THE HONORABLE ALETA A. TRAUGER  
UNITED STATES DISTRICT JUDGE